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16 **UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA**

18 MEGAN SCHMITT, DEANA
19 REILLY, CAROL ORLOWSKY, and
20 STEPHANIE MILLER BRUN,
21 individually and on behalf of
22 themselves and all others similarly
23 situated,

24 Plaintiffs,

v.

25 YOUNIQUE, LLC,

26 Defendant.

27 Case No. 8:17-cv-01397-JVS-JDE

28 **DECLARATION OF ADAM
GONNELLI IN SUPPORT OF
PLAINTIFFS' EX PARTE
APPLICATION TO STAY THE CASE
AND MOTION FOR DISCOVERY
SANCTIONS**

Complaint Filed: 8/17/17

Trial Date: 2/19/19

1 I, Adam Gonnelli, declare as follows:

2 1. I am a partner of the Sultzer Law Group, P.C., counsel for Plaintiffs
3 Megan Schmitt, Deana Reilly, Carol Orlowsky, and Stephanie Miller Brun.

4 2. I make this declaration in support of Plaintiffs' Ex Parte Application to
5 Stay the Case and Motion for Discovery Sanctions.

6 3. Attached hereto as Exhibit 1 is a true and accurate copy of Plaintiffs'
7 June 4, 2018 Notice of 30(b)(6) Deposition.

8 4. Attached hereto as Exhibit 2 is a true and accurate copy of Defendant's
9 July 13, 2018 Objections to Plaintiff's Notice of 30(b)(6) Deposition.

10 5. Attached hereto as Exhibit 3 is a true and accurate copy of a Rough
11 Draft of the July 27, 2018 Transcript of Robert Philips.

12 6. Attached hereto as Exhibit 4 is a true and accurate copy of Rough Draft
13 of the July 27, 2018 Transcript of Vrena Ranallo.

14 7. On July 26, 2018, the day before Defendant's 30(b)(6) depositions
15 were held, Defendant identified the designated witnesses for the topics listed in
16 Plaintiff's Notice of 30(b)(6) Deposition: Robert Phillips for topics 1, 5, and 6, and
17 Vrena Ranallo for topics 2, 3, 4, and 7.

18 8. During the July 27, 2018 deposition of Vrena Ranallo, I notified
19 Defendant's counsel that Defendant's designated 30(b)(6) witness was not adequate
20 and suspended the deposition. See Exhibit 4, annexed hereto at 57:9-12.

1 Dated:

2 Red Bank, New Jersey
3 July 30, 2018

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6 THE SULTZER LAW GROUP P.C.

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